CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following Initial Study for this project in accordance with the California Environmental Quality Act (§ 21000 et seq., California Public Resources Code) and implementing Guidelines (§15000 et seq., Title 14, California Code of Regulations).

I. PROJECT INFORMATION

Project Name:

Removal Action Work Plan for a Non-Time Critical Removal Action, a 12-acre Equestrian Staging Area at East Elliott, Camp Elliott, San Diego, California.

Site Location:

East Elliott is an approximately 3,200-acre, roughly rectangular area approximately 12 miles northeast of downtown San Diego and immediately west and northwest of the City of Santee. East Elliott comprises the southeast corner of the former Camp Elliott, a former Marine Corps training facility that was active in the 1940s and 1950s and once occupied 30,500 acres (Figure1). Mission Trails Regional Park occupies 5,800 acres, located south west of East Elliott. The 12 acre project site is located in the northeastern portion of Mission Trails Regional Park about 300 yards east of the Mast boulevard underpass of SR52. The site is bounded by the right-of way of SR52 to the north, the drainage out of Little Sycamore Canyon to the west, and a Caltrans mitigation Site and the San Diego River to the south.

An ordnance and explosives investigation in the East Elliott area was conducted to evaluate the nature and extent of ordnance contamination at East Elliott. The investigation consisted of dividing East Elliott into four sectors for the purpose of evaluating risk and developing recommendations for each area. The project area is mostly located in Sectors 3 and 4, with less than an acre outside East Elliott (Figure 2).

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Project Description:

The Army Corps of Engineers (ACOE) proposes to perform a surface/subsurface clearance of unexploded ordnance (UXO) in East Elliott, Camp Elliott, The proposed project may also involve Intentional Detonations (Blow-in-place) once an anomaly is identified as UXO. The proposed activities will be conducted under the Defense Environmental Restoration Program (DERP) for Formerly Used Defense Sites (FUDS) consistent with the National Contingency Plan and the Comprehensive Environmental Response, Compensation and Liability Act and relevant Department of Defense (DOD) and Army regulations and guidance for ordnance and explosive (OE) programs. This initial study is being prepared to assess the potential environmental impact from the clearance.

An Engineering Evaluation/Cost Analysis (EE/CA) for East Elliott was prepared and the final review was completed in November 2000. Previous UXO response actions have also been conducted within the boundaries of East Elliott. Once the removal activities are completed, the area will be developed into a multi-use staging area to allow access of the City's Mission Trails Regional Park by horse riders, hikers and bicyclists.

Project Background Discussion

After Camp Elliott closed in 1960, approximately 15,000 acres, including East Elliott, were declared surplus land by the DOD in 1961 and were transferred to the General Services Administration (GSA) for disposition. In 1962, the GSA solicited bids for sale of this land, and by 1974, sold most of the surplus land, including East Elliott, to real estate developers, private parties, and municipalities.

Since the 1970s, OE has been found in several locations at East Elliott. Most of these items are 37- and 75-mm shells, and ordnance fragments that were most likely used during tank firing practice. The majority of this OE was located in the southeast portion of East Elliott, adjacent to the City of Santee. In addition, brush fires in the East Elliott area have reportedly detonated UXO.

The City of San Diego (the City) evaluated environmental impacts of the proposed multi-use staging area in Mission Trails Regional Park. The City prepared an Initial Study and approved a Mitigated Negative Declaration on October 17, 2001. This Initial Study incorporates by reference the Initial Study and Mitigated Negative Declaration for the Mission Trails Regional Park – Multi-Use Staging Area Project. The City's proposed project is the development of a twelve-acre, multi-use staging area to allow access to the City's Mission Trails Regional Park by horse riders, hikers, and bicyclists. The proposal would facilitate access to the existing park trail system from the northern portion of the park. The proposed improvements include a 5,000 square feet, main structure on the northwestern portion of the site, containing park maintenance facility, park ranger offices, conference room, display room with information counter, park staff restroom with shower, garage, group kitchen, public restrooms, and storage room, a 2,300 square foot covered group picnic shelter attached to the west side, and a screened storage yard for park maintenance attached to the east side.

Investigations in Camp Elliott

In recent years (i.e., early 1980s to the present), considerable attention has been focused on OE removal actions within the Tierrasanta and Mission Trail areas of former Camp Elliott located southwest of East Elliott. Together with East Elliott and smaller, ancillary parcels to the north, these areas comprised the surplus land that was sold by the DOD in the 1960s and early 1970s. Most of the remainder of the former Camp Elliott, north of Tierrasanta, Mission Trails, and East Elliott, lies within MCAS Miramar.

The pivotal event that drove these investigations and subsequent ordnance cleanups in the Tierrasanta and Mission Trail areas was the death of two young boys in the Tierrasanta community in December 1983 after finding an unexploded 37-mm High Explosive (HE) projectile while playing in the open space adjacent to their homes. Considerable public attention was brought to bear on OE hazards associated with former Camp Elliott following this accident. Two additional ordnance sweeps of the area and a formal public awareness campaign were implemented during 1984 to 1985. These events also provided the impetus for continued evaluation and active remediation of OE hazards in the area since 1984. In general terms, these efforts have focused first on the Tierrasanta study area, followed by the Mission Trails study area immediately to the east of Tierrasanta. A comprehensive feasibility study for ordnance remediation in the Tierrasanta area was conducted for Army Corps of Engineers, Huntsville Center (CEHNC) in 1988. This study evaluated a 1,897-acre study area within Tierrasanta and sought to determine the magnitude and extent of ordnance contamination there and to evaluate

appropriate remedial alternatives in order to remedy the imminent public safety hazards posed by UXO. The evaluation of the ordnance contamination in this study concluded the following:

- average density of surface OE contamination ranged from 0.28 to 29.3 items per acre;
- average density of subsurface OE contamination (i.e., ordnance and fragments found beneath the surface) ranged from 3.0 to 90.7 items per acre;
- 87 percent of the OE encountered lay within 6 inches of the ground surface and 94 percent lay within 12 inches;
- approximately 1 percent of the OE contamination posed a potential explosive hazard (i.e., UXO); and
- ordnance was World War II or Korean War vintage and was varied in size and type (small arms munitions to 155-mm howitzer projectiles).

Several remedial action alternatives for ordnance clearance were considered, including electromagnetic sweeps of former Camp Elliott accompanied by brush removal (through manual cutting or controlled burning) and surface visual sweeps without brush removal. Non-ordnance removal alternatives were also considered including repurchase of former Camp Elliott by the U.S. government, institutional restrictions on land use, and physical restrictions (fencing or signs). Due to the complexities of former Camp Elliott, no single alternative was judged appropriate for all sub-areas within Tierrasanta. Competing alternatives were evaluated for each of six sub-areas on the basis of the following criteria: 1) public safety, 2) economic feasibility, 3) technical feasibility, 4) environmental issues, 5) public opinion, and 6) federal, state, and local regulations. The following preferred alternatives were selected:

- reacquisition by the federal government (area adjacent to MCAS Miramar);
- fencing (area along the construction corridor for State Highway 52);
- ordnance clearance via electromagnetic sweeps and manual brush removal (open space areas adjacent to active residential developments or existing residential developments and open space/undeveloped areas where vegetative cover is heavy); and
- ordnance clearance via electromagnetic sweeps without brush removal (for the areas undergoing active residential development or open space/undeveloped areas where vegetative cover is thin).

Following the preparation of this feasibility study in 1988, extensive ordnance clearance was undertaken within several of the study subareas. At Mission Trails, ordnance clearance using magnetometer sweeps and excavation of anomalies was completed in 1996. Within the area adjacent to the southwest corner of East Elliott, no live ordnance (i.e., UXO) was recovered.

1996 Site Investigation and EE/CA Approach

The investigation approach consisted of dividing East Elliott into four sectors (Sectors 1 through 4, Figure 2) for the purposes of evaluating risk and developing recommendations for each sector. The sectors are described as follows:

- SECTOR 1: Sector 1 is approximately 750 acres in the northwest quadrant of East Elliott and encompasses the area that would be occupied by the proposed city landfill. The sector is bounded by Oak Canyon to the west and includes Spring Canyon along the eastern perimeter. Topography is typified by canyons and

narrow ridges with steep slopes and evidence of landslides. Vegetation is characterized by mixed chaparral and grass, with local expanses of dense brush in the southern and western portions of the sector. Roads are constructed along ridges.

- SECTOR 2: Sector 2 is approximately 650 acres in the northern central portion of East Elliott. It encompasses the area that will eventually be occupied by the existing sanitary landfill (currently 170 acres). Little Sycamore Canyon is oriented north-south in the center of the sector. The predominant slope of the terrain is greater than 30 degrees. Vegetation is characterized by grasslands and mixed chaparral. Roads are constructed along ridges and within Little Sycamore Canyon.

- SECTOR 3: Sector 3 is approximately 750 acres in the southwest quadrant of East Elliott. The sector is bounded by Oak Canyon to the west, Little Sycamore Canyon to the east, and State Highway 52 to the south. Topography is primarily steep-walled canyons and narrow ridges in the northern part of the sector, and less steep slopes in the southern area. Vegetation is characterized by mixed chaparral, dense brush, and poison oak in the north, and by grasslands in the south.

- SECTOR 4: Sector 4 is approximately 1,050 acres in the eastern portion of East Elliott. It includes the area that is most frequently used for recreational activities. The sector is bounded by Sycamore Canyon to the east, the county landfill and Little Sycamore Canyon to the west, and the City of Santee to the south. The terrain is defined by three primary ridges with moderate slopes. Mast Boulevard and West Hills High School are in the southeast corner of the sector. Vegetation is primarily grasslands and mixed chaparral.

Eighty-nine survey grids, each measuring 100 by 200 feet, were established within the four sectors. The grids were further divided into subsections of 25 feet by 25 feet. Brush was thinned and OE was cleared from the surface within the entire area of each survey grid. Each survey grid was then swept using a magnetometer, and all anomalies to a depth of 4 feet below ground surface (bgs) were mapped and flagged. All but six survey grids contained anomalies detected by the subsurface sweep. The six grids without anomalies were located in Sector 1 of East Elliott.

1996 Site Investigation Results

OE was detected and removed from all four sectors of East Elliott. However, the majority of the survey areas had no OE. In addition, most anomalies detected consisted of “falsepositives” or metal debris such as nails and wire. OE from a variety of ordnance was found during the investigation. The majority of identifiable OE was from 37-mm and 75-mm projectiles. The maximum depth at which any OE was found at East Elliott was 18 inches, and most OE was found on the surface. UXO was detected in all of the East Elliott sectors except Sector 3. No UXO was found deeper than 8 inches below ground surface (bgs). The UXO consisted of:

- one live 75-mm HE projectile in Sector 1;

- two live 75-mm HE projectiles in Sector 2; and

- one live 75-mm HE projectile in Sector 4.

The largest concentration of OE was in the southeast quadrant (Sector 4), which is the area of East Elliott that is the closest and most accessible to populated areas and schools. All but one of the 75-mm HE projectiles discovered during the investigation were found pointing westward, indicating that the projectiles were likely fired from points at the southeast corner of East Elliott. In addition, a large number of inert OE fragments and expended fuses were found in Sector 4. All live UXO and suspect fuses were detonated at the site .

Twenty-seven identifiable OE items (consisting of both inert OE and UXO) were encountered during sampling at East Elliott. Most of the anomalies excavated during the sampling program consisted of scrap, including OE fragments, nails, wire, and miscellaneous metallic debris. A total of 758 pounds of OE and scrap was detected and removed during the investigation and was disposed of at the Sycamore Sanitary Landfill Recycling Center.

Guidance, Regulations, or other Policy

The following represents Guidance, Regulations, or other Policy under which the operations will be conducted.

- DOD 6055.9-STD DOD Ammunition and Explosives Safety Standards that:
    - ❖ provide the maximum possible protection to personnel and property, both inside and outside the installation, from the damaging effects of potential accidents involving DOD ammunition and explosives; and
    - ❖ limit the exposure of a minimum number of persons, for a minimum time, to the minimum amount of ammunition and explosives consistent with safe and efficient operations.
- 29 Code of Federal Regulations 1910.120, Office of Safety Hazard Assessment Hazardous Waste Operations and Emergency Response
- DOD 6055.9-STD DOD Ammunition and Explosives Safety Standards
- Army Regulation (AR) 385-64, Ammunition and Explosives Safety Standards
- Department of Army Pamphlet (DA Pam) 385-64, Ammunition and Explosives Safety Standards
- Engineer Regulation (ER) 385-1-92, Safety and Occupational Health Requirements for Hazardous Toxic Radioactive Waste (HTRW) Activities
- Engineer Pamphlet (EP) 1110-1-18, OE Response
- Engineer Manual (EM) 385-1-1, ACOE Safety and Health Requirements Manual

Proposed Project Activities

The project involves a surface/subsurface clearance of the site in those grids that are accessible to personnel and will only require minimal vegetation trimming. All munition items encountered will be destroyed in place. The project site will be surveyed and marked out in 100 x 100 square foot grids. Based on the information provided in the EE/CA, it is projected that approximately 22 anomalies will be encountered per grid, 67% of them on the surface and 33% subsurface, with the average depth of 4.6 inches. The Schonstedt detector will be used to locate surface and subsurface anomalies.

In the event that an UXO cannot be destroyed onsite, or if an unidentified UXO is located, the ACOE onsite Safety Representative will be notified for appropriate assistance. All UXO will undergo an initial assessment to positively identify the piece of ordnance. The assessment will include fusing, condition, and filler. No disposal procedures will be applied until the item has been positively identified. Transportation of UXO will not occur on this project site. There are no UXO storage areas since all UXO will be detonated in place.

The production objective is for each team to clear 3.3 grids (3 acres) per day. During search operations, at least one grid separation will be maintained between the teams. Based on the information provided in the EE/CA, it is projected that approximately 31 UXO/OE will be encountered at the site subsurface, with the average depth being 4.6 inches.

Because of ground cover, Schonstedt magnetic locators will be utilized to assist in the location of surface ordnance. The team leader will assure that the separation of personnel, on the sweep line, is adequate to avoid interference between the instruments, yet sufficient to assure complete ground coverage. This site contains varying terrain – different sweep techniques, to include varying sweep line intervals, may be required based on the terrain. If the terrain is too steep to sweep safely, that portion of the grid not swept will be mapped. It is the team leader's responsibility to devise the clearance method(s) suitable to the specific grid to assure complete clearance.

Motor vehicles will be restricted to existing, actively used roads, during normal operations. Trails, which once were roads, will be avoided during normal operations. Personnel will drive as near as practical to the work site and walk into and out of the grid(s). In the event of a medical or fire emergency, vehicles will be utilized wherever necessary.

Health and Safety Plan

- All SCI and subcontractor personnel will adhere to the safety precautions outlined in this work plan. Violation of UXO-related safety precautions will be grounds of dismissal.

- All personnel involved in the disposal/demilitarization of UXO/OE will be aware of and adhere to established safety precautions. All personnel will be alert for circumstances not covered in this work plan and stop operations until those circumstances have been addressed. Safety and safe working practices are established habits for SCI and subcontractor personnel when working with or in the vicinity of items which are potentially dangerous by reason of their explosive, flammable, or toxic characteristics.

- The Health and Safety Plan will provide instructions for workers on standard work practices, hazard communication, identification, handling, removal, transportation, and detonation.

General Safety Precautions

- Review electromagnetic radiation (EMR) hazards and precautions and electrical grounding procedures.

- Carry blasting caps in approved containers, and keep them out of the direct rays of the sun.

- Do not handle, use, or remain near explosives during the approach or progress of an electrical storm. All persons will retire to a place of safety at a distance specified by the Senior UXO Supervisor based on the circumstances.

- Do not use explosives or accessory equipment that are obviously deteriorated or damaged. They may detonate prematurely or fail completely.

- Do not abandon any explosives. Fatal or serious accidents can result from such careless practice.

- Do not use unexploded dud ordnance items for demolition purposes. They may be in an extremely sensitive and hazardous condition.

- Disposal/Demilitarization operations will not be initiated until at least one-half hour after sunrise and will be concluded by at least one-half hour prior to sunset. SCI's normal work schedule will be 0700-1730, Monday through Thursday. Earlier start time may be implemented dependent upon the anticipated heat temperature.

- Restrict and control access to the disposal site to a minimum of authorized personnel necessary for safe conduct of the disposal operations.

- Do not carry fire- or spark-producing devices into a disposal site except as specifically authorized.

- Do not smoke except in areas specifically designated. After smoking, assure that all burning tobacco is extinguished.

- Avoid inhaling, and skin contact with explosives, the smoke, fumes, vapors of explosives, and related hazardous materials.

Operations in Populated/Sensitive Areas

Each team will have a portable barricade in the team vehicle. If a trail is adjacent to the grid being cleared, the barricade will be placed on the trail. A **DANGER EXPLOSIVES KEEP OUT** sign in English/Spanish will be mounted on the barricade. It is anticipated that some bike riders and hikers will ignore the barricade, so personnel will be alert for intruders into the clearance area. When intruders are detected, all operations will cease until such time as the intruders are escorted out of the exclusion area. The Team Leader will annotate the down time on the grid sheet.

Intrusive Operations

The project requires the area to be cleared. If an anomaly is found within 1701 feet, the Minimum Separation Distance (MSD) for the most Probable Munition (75 mm), of Highway 52, the Miniature Open Front Barricade (MOFB) will be utilized. The MOFB is designed to defeat primary fragments to the rear and sides of the MOFB in the case of an accidental/unintentional detonation during intrusive activities. If an anomaly is encountered within 200 feet of the Highway or road, the MOFB will be utilized and the traffic will be stopped until investigation of the anomaly is complete.

Intentional Detonations (Blow-in-Place)

Dependent upon the location of an intended detonation, i.e., in close proximity to Highway 52, sandbagging will take place. The sandbags will be liberally soaked with water. If possible, a string-type trimmer will be used to clean dried grasses as close to the ground as possible to reduce fire risk.

Blast chambers will not be utilized for this project because of the types of munition, heavy vegetation and uneven steep terrain of the site.

Surrounding Land Use

East Elliott consists of 165 individual parcels, including more than 85 private property owners; the cities of San Diego and Santee, California; several land development firms; two school districts; and a public utility company. Fire breaks and jeep trails across this area do not coincide with parcel boundaries. The pattern of present-day ownership is directly related to the U.S.

government's efforts to dispose of East Elliott as excess land during the 1960s. All but two small parcels (comprising a narrow, 5-acre strip adjacent to MCAS Miramar) have been transferred to private (approximately 2,260 acres, or 70 percent) or municipal (approximately 940 acres, or 30 percent) ownership within East Elliott. Based on data obtained from the County of San Diego Assessor's Office, approximately 20 percent of the privately owned parcels have been sold to other private parties in the last 3 years. A current list of property owners (as of July 1999) is provided in the East Elliott Public Involvement Plan.

Current land use at East Elliott consists of undeveloped open space and the Sycamore Landfill, a Class III sanitary landfill, formerly operated by the County of San Diego Department of Public Works, Solid Waste Division. However, the landfill operation was sold in late 1997 to a private corporation, Allied West Industries Access to the landfill is by paved road from Mast Boulevard along State Highway 52, through an entry gate, and north up Little Sycamore Canyon to the landfill site. With a recent 53-acre expansion, the landfill currently encompasses approximately 170 acres. The landfill facilities include an operations building, regional recycling center, methane facility, and perimeter fence. The size of the landfill, upon completion of all disposal activities, will be approximately 500 acres. ACOE provided ordnance clearance (i.e., OE removal) in support of recent construction activities.

The majority of East Elliott is undeveloped land, and unrestricted access along its southern boundary makes it attractive for a variety of recreational uses by hikers, motorcyclists, mountain bicyclists, etc. Several clusters of large boulders near the southeast corner of the site are used by rock climbers . The mostly weekend recreational activities are most common in the southern and eastern areas of the site. In addition, several "children's forts" were observed on the east side of East Elliott, including some shallow excavations.

Based on site observations, illicit activities such as refuse dumping and underage drinking also occur at East Elliott. In addition, hunters observed at the site in December 1996 were removed by authorities because hunting is an illegal activity in the East Elliott area.

While East Elliott is currently uninhabited, the neighboring residential areas in the City of Santee (to the east and southeast of East Elliott) experienced nearly two decades of continuous economic growth from the 1970s to the late 1980s, with increases in population and development pressures on land. The City of Santee, along with the entire Southern California region, experienced a sustained recession in the early 1990s. The pressure and incentive for land development lessened considerably during this recession, but may increase in response to recent economic growth.

Open Space

The City of San Diego Planning Department has evaluated the biological resources of East Elliott in the context of its draft regional plans for open space and habitat protection. Of particular concern is the Multiple Species Conservation Program (MSCP), which seeks to preserve endangered habitat such as the coastal sage habitat, home to the California gnatcatcher. One of the land use options for East Elliott includes dedicated open space in this program.

The MSCP is a comprehensive habitat conservation planning program for southwestern San Diego County developed cooperatively by participating jurisdictions and special districts in partnership with the wildlife agencies, property owners, and representatives of the development industry and environmental groups. The purpose of the MSCP is to preserve a network of habitat and open space to protect biodiversity and to identify priority areas for conservation and other areas for future development. The MSCP Plan will serve as: 1) a multiple species Habitat Conservation Plan pursuant to Section 10(a) of the federal Endangered Species Act and, 2) a Natural Community Conservation Program (NCCP) pursuant to the California NCCP Act of 1991 and the state Endangered Species Act.

The City of San Diego MSCP Subarea Plan includes areas of East Elliott north of Mast Boulevard, excluding the Sycamore Landfill and an area of developed land in the southwest portion of the site adjacent to the City of Santee. As part of the MSCP, the eastern portion of San Diego, including East Elliott, was surveyed in 1996 for the presence of endangered, threatened or other sensitive species and habitat areas. East Elliott is included within a "core resource area," which is defined as an area with a "high concentration of sensitive biological resources which, if lost, could not be replaced or mitigated elsewhere". Over 65 percent of the habitat within East Elliott is considered to be of "very high" value. Important habitats at the site include coastal sage scrub (60 percent) and riparian scrub (2 percent). Sensitive species identified in the vicinity of East Elliott include willowy monardella, San Diego ambrosia, least Bell's vireo, and California gnatcatcher.

According to the MSCP Subarea Plan, the City of San Diego proposes to preserve approximately 80 percent of the area encompassing East Elliott and Mission Trails Regional Park. The existing Sycamore Landfill would be maintained with eventual restoration as a passive preserve. If a City landfill is constructed within the Oak and Spring canyons area, the development footprint would not exceed 25 percent of the preserve area at any one time. Major issues identified for consideration for preserve management in the East Elliott area include erosion, off-road vehicle (ORV) use, incursion of exotic (non-native) species, and encroachment of existing development. Private land within East Elliott is currently considered potentially preserved. East Elliott has been identified as a Multi-Habitat Planning Area (MHPA) which may eventually include acquisition of up to 11,000 acres of private land from "willing" sellers at a "fair market value." The estimated value of land in the San Diego area is up to $10,000 per acre. Of particular interest is the acquisition of canyon properties and other open space to provide habitat within an urbanized area. Some lands within the areas of habitat identified in the MSCP will be allowed to be developed as provided in the individual subarea plans. Overall management policies presented in the Elliott Community Plan, including the proposed system of open space, are incorporated by reference in the MSCP Subarea Plan .

Agencies Having Jurisdiction Over the Project/Types of Permits Required:

The ACOE will oversee the proposed removal action at East Elliott. The California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC) as a lead agency provides regulatory oversight for the removal action. California Health and Safety Code (H&S Code), Section 25358.9 exempts a responsible party from permit requirements including emergency permits providing there is an approved Remedial Action Plan or Removal Action work plan pursuant to Section 25356.1, H&S Code.

II. DISCRETIONARY APPROVAL ACTION BEING CONSIDERED BY DTSC

- ❑ Initial Permit Issuance
- ❑ Permit Renewal
- ❑ Permit Modification
- ❑ Closure Plan
- ❑ Regulations
- ❑ Removal Action Plan
- ❑ Removal Action Work Plan
- ❑ Interim Removal
- ❑ Other (Specify)

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Program/ Region Approving Project:

California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC), Office of Military Facilities, Southern California Operations

Contact Person/ Address/ Phone Number:

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III. ENVIRONMENTAL RESOURCES POTENTIALLY AFFECTED

The boxes checked below identify environmental resources which were found in the following ENVIRONMENTAL SETTING/IMPACT ANALYSIS section to be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact".

- ❑ Aesthetics
- ❑ Agricultural Resources
- ❑ Air Quality
- ❑ Biological Resources
- ❑ Cultural Resources
- ❑ Geology And Soils
- ❑ Hazards and Hazardous Materials
- ❑ Hydrology and Water Quality
- ❑ Land Use and Planning
- ❑ Mineral Resources
- ❑ Noise
- ❑ Population and Housing
- ❑ Public Services
- ❑ Recreation
- ❑ Transportation and Traffic
- ❑ Utilities and Service Systems
- ❑ Cumulative Effects

IV. ENVIRONMENTAL IMPACT ANALYSIS

The following pages provide a brief description of the physical environmental resources that exist within the area affected by the proposed project and an analysis of whether or not those resources will be potentially impacted by the proposed project. Preparation of this section follows guidance provided in DTSC's California Environmental Quality Act Initial Study Workbook [Workbook]. A list of references used to support the following discussion and analysis are contained in Attachment A and are referenced within each section below.

Mitigation measures which are made a part of the project (e.g: permit condition) or which are required under a separate Mitigation Measure Monitoring or Reporting Plan which either avoid or reduce impacts to a level of insignificance are identified in the analysis within each section.

1. Aesthetics

Project activities likely to create an impact:

- Vegetation Trimming

- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

The project is located in unrestricted recreational land. The surface/subsurface ordnance removal action will be restricted to areas of non-dense vegetation and non-steep slopes. When a detonation of ordnance is planned, sandbags filled with construction grade sand will be utilized to tamp the detonation and minimize any damage to nearby trees and shrubs. Removal action activities are to be conducted during time frames approved by U.S. Fish and Wildlife Biologists/Botanists, so as not to interfere with species.

Analysis of Potential Impacts:

The planned activities primarily involve identifying UXO by magnetometers, excavation by hand tools and detonation-in-place of ordnance items. The project activities will not result in the addition of new light and/or glare; and will not block any views, or obstruct any scenic vista or view open to the public.

Therefore this project will not:

a. Have a substantial adverse effect on a scenic vista.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.

c. Substantially degrade the existing visual character or quality of the site and its surroundings.

d. Create a new source of substantial light of glare, which would adversely affect day or nighttime views in the area.

References: 5, 23

Findings of Significance:

❑ Potentially Significant Impact
❑ Potentially Significant Unless Mitigated
❑ Less Than Significant Impact
☒ No Impact

2. Agricultural Resources

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance

- Intentional UXO Detonations

Description of Environmental Setting:

The project site is mostly grassland and mixed-chaparral. There are currently no agricultural activities occurring on the project site.

Analysis of Potential Impacts:

Because the land use is not historically or currently agricultural there is no impact to agricultural resources.

Therefore this project will not:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

Findings of Significance:

❑ Potentially Significant Impact
❑ Potentially Significant Unless Mitigated
❑ Less Than Significant Impact
☒ No Impact

3. Air Quality

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

The project area lies within the San Diego Air Basin (SDAB). The concentration of pollutants within the SDAB is measured at 10 stations maintained by the Air Pollution Control District (APCD) and the California Air Resources Board (CARB). Air quality at a particular location is a function of the type and amount of pollutants being emitted into the air locally and throughout the basin, and of the dispersal rates of pollutants within the region. The major factors affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by atmospheric inversions), and the local topography. Air quality is commonly expressed

as the number of days on which air pollution levels exceed State standards set by CARB and Federal standards set by the Environmental Protection Agency (EPA).

With respect to PM-10, there has been a general lack of improvement in air quality in the SDAB as a whole. The highest PM-10 levels in the air basin occur along the Mexican border as measured at the Otay Mesa monitoring station. At this station, maximum PM-10 levels for the years 1992 through 1994 have been measured to be 120, 159, and 129 mg/m^3, respectively. At the two nearest monitoring stations to the project site, the maximum PM-10 levels ranged between 60 mg/m^3 and 80 mg/m^3 for the years 1992-1994. While these maximum concentrations are above State standards, they are significantly below Federal standards. The number of days in which State and Federal PM-10 standards were exceeded cannot be determined because PM-10 levels are not determined on a daily basis.

Analysis of Potential Impacts:

Excavation by hand of magnetic anomalies would generate less dust than that caused by the recreational activities and vehicular traffic around the project area. Very small amounts of fugitive dust would be generated due to excavating ordnance. Detonation of UXO would also generate small quantities of dust. Both activities would involve a very confined area and occur for only a short period. No long-term pollution would be caused by the proposed activities. The gaseous products formed by the explosion are normal constituents of the atmosphere and readily disperse. No detectable effect on air quality would result from the explosive destruction of ordnance within the project area. Therefore, the project related impacts to air quality would be short-term and insignificant.

Therefore the project will <u>not</u>:

a. Conflict with or obstruct implementation of the applicable air quality plan.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).

d. Expose sensitive receptors to substantial pollutant concentrations.

e. Create objectionable odors affecting a substantial number of people.

References: *17, 18, 20, 21.*

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ❑ Less Than Significant Impact
- ☒ No Impact

4. Biological Resources

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

Project Site and Surrounding Area

The 12-acre project site is located in the northeastern portion of Mission Trails Regional Park about 300 yards east of the Mast Boulevard underpass of SR 52. The site is bounded by the right-of-way of SR 52 to the north, the drainage out of Little Sycamore Canyon to the west and a Caltrans mitigation site and the San Diego River to the south. Much of the currently undeveloped site contains non-native grasslands with patches of native vegetation including coastal sage scrub and broom baccharis. The surrounding area consists of narrow ridges and canyons which trend north to south through the site. Intermittent streams flow southward toward the San Diego River, which is approximately 0.4 miles south of East Elliott. Topography is typified by moderate to steep slopes that are predominantly vegetated with native grassland, coastal sage or black sage habitat, or chaparral. Deciduous trees and other riparian vegetation are locally abundant in the two largest canyons in East Elliott, Oak Canyon and Spring Canyon. Several dirt roads and trails are located within East Elliott, particularly along ridges and within canyons. Many of these roads are accessible only by 4-wheel-drive vehicles. Most access to the site is provided by roads and trails that enter East Elliott from the south and east.

Multiple Species Conservation Program

The MSCP is a comprehensive habitat conservation planning program for southwestern San Diego County developed cooperatively by participating jurisdictions and special districts in partnership with the wildlife agencies, property owners, and representatives of the development industry and environmental groups. The purpose of the MSCP is to preserve a network of habitat and open space to protect biodiversity and to identify priority areas for conservation and other areas for future development. The MSCP Plan will serve as: 1) a multiple species Habitat Conservation Plan pursuant to Section 10(a) of the federal Endangered Species Act and, 2) a Natural Community Conservation Program (NCCP) pursuant to the California NCCP Act of 1991 and the state Endangered Species Act. The City's planned wildlife preserve, entitled the Multi-Habitat Planning Area (MHPA), implements the adopted MSCP.

The City of San Diego MSCP Subarea Plan includes areas of East Elliott north of Mast Boulevard, excluding the Sycamore Landfill and an area of developed land in the southwest portion of the site adjacent to the City of Santee. As part of the MSCP, the eastern portion of San Diego, including East Elliott, was surveyed for the presence of endangered, threatened or other sensitive species and habitat areas. East Elliott is included within a "core resource area," which is defined as an area with a "high concentration of sensitive biological resources which, if lost, could not be replaced or mitigated elsewhere". Over 65 percent of the habitat within East Elliott is considered to be of "very high" value.

The MSCP states that the goals and objectives for the optimum condition for the East Elliott and Mission Trails Regional Park would be a mosaic of native habitats and compatible recreational activities, with restoration and transplantation of existing populations of endangered, threatened, and/or sensitive species where necessary. A condition of coverage for San Diego ambrosia requires 90% preservation of the population at the Mission Trails Regional Park site.

The following is a list of species that are covered under the MSCP:

Plants:	Animals:
Encinitas baccharis	Burrowing owl
Orcutt's brodiaea	California gnatcatcher
Plamer's ericameria	California rufous-crowned sparrow
San Diego ambrosia	Cooper's hawk
San Diego barrel cactus	Least Bell's vireo
San Diego goldenstar	Mule deer
San Diego thorn-mint	Orange-throated whiptail
Slender-pod jewelflower	San Diego horned lizard
Variegated dudleya	Tricolored blackbird
Willowy monardella	Western bluebird

The major issues that will require consideration for management in the Mission Trails/East Elliott area, in order of priority, are:

1. Intense land uses and activities adjacent to and in covered species habitat and linkages.

2. Potential associated impacts related to siting a future landfill in East Elliott.

3. Erosion, urban runoff and overuse of recreational areas adjacent to sensitive drainage areas.

4. Off-road vehicle activity.

5. Exotic (non-native), invasive plants and animals.

6. Encroachment from existing development.

7. Utility, facility and road repair, construction, and maintenance activities.

The MSCP requires impacts to wetlands, including vernal pools in naturally occurring complexes, and narrow endemic species, inside the MHPA to be avoided. Outside the MHPA, narrow endemic species will be protected through the following measures, as deemed appropriate: 1) avoidance; 2) management; 3) enhancement; and/or 4) transplantation to areas identified for preservation. Unavoidable impacts associated with reasonable use or essential public facilities would need to be minimized and mitigated. In addition, state and/or federal permits may be required for impacts to wetland habitat. The following is a list of narrow endemic species:

San Diego thorn-mint
Shaw's agave
San Diego ambrosia
Aphanisma
Coastal dunes milk vetch
Short-leaved dudleya
Variegated dudleya
Otay tarplant
Prostrate nevarretia
Snake cholla
California Orcutt grass
San Diego mesa mint
Otay mesa mint

If working in state or federally listed species habitat or wetlands, any necessary permits from appropriate agencies must be obtained prior to commencement of research, with a copy provided to the City of MSCP management entity.

Habitat

The sensitive habitats that occur on or adjacent to the project site are riparian woodland, southern willow scrub, mule fat scrub, juncos meadow, sycamore trees, Diegan coastal sage scrub, riparian scrub, broom baccharis scrub, native and non-native grasslands and vernal pools. Significant populations of willowy monardella, San Diego thorn-mint, Orcutt's brodiaea, variegated dudleya, San Diego goldenstar, San Diego ambrosia, least Bell's vireo, and California gnatcatcher are a few of the covered species that occur in this area. The White tailed kites and Red-shouldered hawk have both been identified in the project area.

Federally Threatened and Endangered Species

Two species which inhabit the East Elliott area throughout the year have been Federally protected by the Endangered Species Act; the coastal California gnatcatcher (Federally threatened), and the San Diego fairy shrimp (Federally endangered). Two other Federally endangered species may occur as transients in one area of East Elliott, the least Bell's vireo and Southwestern willow flycatcher. Populations of two additional species, willowy monardella and San Diego ambrosia, have been identified nearby in Mission Trails Regional Park. Willowy monardella was seen occasionally in suitable habitat in Spring Canyon, but evidently does not grow there predictably from one year to the next. Historically, the Southwestern arroyo toad inhabited this region of the San Diego River and, most likely, used dry and sandy terraces along Spring Canyon as foraging habitat even during the non-breeding season. (EECA Montgomery Watson, 1999)

California Natural Diversity Database (CNDDB) Species of Concern

A report of the California Department of Fish and Game Natural Diversity Data Base was prepared for this project on February 6, 2003 for U.S. Geological survey quad, La Mesa. According to the report the following listed species have the potential to be found in the project area:

Animals:

Prairie falcon
Burrowing owl
Coastal California gnatcatcher
Yellow warbler
Dulzura pocket mouse
Northwestern San Diego pocket mouse
San Diego desert woodrat
San Diego horned lizard
Orange-throated whiptail
Northern red-diamond rattlesnake
San Diego fairy shrimp
Two-stripped garter snake

Plants:

Valley needlegrass grassland
San Diego ambrosia
San Diego barrel cactus
Variegated dudleya
Summer holly
San Diego thorn-mint
San Diego mesa mint
San Diego goldenstar

Previous Project Site Surveys

The Initial Study for Mission Trails Regional Park – Multi-Use Staging Area Project required a general biological survey, a rare plant survey, vegetation mapping, and a general zoology survey for the project site. Please see appendix B for the project surveys. Ten Sensitive animal species were observed within the project or surrounding area during the Helix survey: one reptile (orange-

throated whiptail), eight birds (white-tailed kite; red-shouldered hawk; turkey vulture; yellow warbler; yellow breasted chat; Southern California rufous-crowned sparrow; grasshopper sparrow; least Bell's vireo) and one mammal (San Diego black-tailed jackrabbit). A total of eight road pool (disturbed basins) that would water during winter/spring rains were observed along the dirt road adjacent to the Caltrans mitigation site. No sensitive plants were observed on site during the Helix surveys. However, the federal proposed endangered San Diego ambrosia was previously observed within the project site and is included in the report. Three shoots of this plant were observed near the dirt road, east of the easterly drainage on the project site.

The project site includes two drainages that lead to canyons north of SR-52 that serve as wildlife corridors. The western canyon is a continuous wildlife corridor with access to open space to the north. While SR-52 bridges over the western drainage, this roadway interrupts the eastern drainage to the north of the project site, and as a result, the wildlife corridor function of the easterly drainage is limited. Project activities may border this eastern drainage. A Caltrans riparian habitat mitigation site borders the project site to the south, separated by a dirt roadway used by SDG&E for maintenance vehicle access and by Park Rangers.

Project activities may impact approximately 11.77 acres, including 0.37 acre of Diegan coastal sage scrub, 0.30 acre of disturbed Diegan coastal sage scrub, 0.41 acre of disturbed broom baccharis scrub, 10.00 acres of non-native grassland, and 0.69 acre of disturbed habitat.

Analysis of Potential Impacts:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

No heavy equipment of any type will be utilized during this clearance, nor is any wholesale movement of soils allowed, for any reason. Candidate, sensitive, and special status species have been identified either on or adjacent to the project site by biological surveys done by the MSCP and the CNDDB. Of particular concern, as identified by the MSCP, is the San Diego ambrosia which has been identified on the project site. Project activities including intrusive investigations to find UXO on site, vegetation pruning and removal around identified UXO, and digging small holes which will be refilled with excavated soil for the purpose of UXO clearance and detonation may have a significant impact on the San Diego ambrosia.

Several nesting raptors, such as the least Bell's vireo (breeding season of March 15 to September 15); California gnatcatcher (breeding season of March 1 to August 15); and the White tailed kite and Red-shouldered hawk (breeding season of December 1 to June 30), have been identified on the project site by biological surveys (see appendix B). Project activities such as intrusive investigations and UXO clearance and detonation may have a significant impact on these nesting raptors if the noise levels in the project area exceeds 60 dB (hourly average) during their breeding seasons. There may be impacts to raptor hunting habitats (coastal sage scrub subtypes, native and non-native grassland, primarily), however since project activities only include minimal pruning (30%) of vegetation around UXO found on the project site this will be of no concern to this project. Although raptor nests are found on site no nests would be directly impacted by project activities.

Another potential indirect effect associated with the project is detonation noise impacts to coastal California gnatcatchers (should they occur) in the adjacent MHPA. These effects would be considered significant where construction occurs within 500 feet of an active gnatcatcher nest during the breeding season. The Caltrans mitigation site to the south of

the project site may contain nesting least Bell's vireos. If project grading were to occur within the breeding season of the least Bell's vireo then significant impacts to this species from detonation noise and disturbance may result. A non-occupied raptor nest was observed in a sycamore tree west of the project site. Nesting raptors are protected by the Migratory Bird Treaty Act, and impacts to nesting activities would be considered significant.

When a detonation of an ordnance item is planned, sandbags filled with construction grade sand will be utilized to tamp the detonation and minimize any damage to nearby trees and shrubs. The preparation shall be thoroughly soaked with water and the immediate area watered as well to minimize the possibility of secondary fires.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Project activities will require some minor trimming or removal of vegetation for intrusive investigation and UXO clearance and detonation. Areas pruned of vegetation will be approximately 2 feet by 2 feet areas to allow for intrusive investigation. After project activities have been completed vegetation should reestablish itself. However since the project does not entail development or large scale removal of vegetation on the project site there will be no adverse effects to riparian habitat or other sensitive natural communities.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

There were eight "road pools" detected in SDG&E access road and reported in the biological survey conducted by the biology consultant for HELIX. These "pools" contained no evidence of vernal pool or wetland vegetation; they were not City-defined wetlands. Therefore there are no wetlands or vernal pools located within the project area, and the project activities will not have a substantial adverse effect on federally protected wetlands.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

There are wildlife corridors located on the project site in the canyons, however no physical barriers will be constructed and the project does not entail development. Teams of 7 to 9 persons will be geologically surveying the site on foot and the project activities are only anticipated to last 2-4 weeks. Therefore the project will have a less than significant impact on wildlife corridors.

e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

City ordinances include the Resource Protection Ordinance (RPO) and the Hillside Review Ordinance and Guidelines. The RPO is designed to protect sensitive biological resources and hillsides through limitation of encroachment into these lands to a maximum of 20% of the parcel, plus 15% in certain limited circumstances. The Hillside Review Ordinance and Guidelines purpose is to provide supplementary development regulations to underlying zones to assure that development occurs in such a manner as to protect the natural and topographic character and identity of these areas, environmental resources, the aesthetic qualities and restorative value of lands, and the

public health, safety and general welfare by insuring that development does not create soil erosion, silting of lower slopes, slide damage, flooding problems, and severe cutting or scarring. These city policies and ordinances are not applicable because the project does not entail development.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

As discussed under "Description of Environmental Setting", San Diego County has prepared the MHPA to implement the MSCP. Most of the MHPA guidelines and major issues do not apply to this project because the project does not entail development or construction. Project activites are short term 2-4 weeks, do not involve vehicles, and do not introduce exotic or invasive plants and animals. The MHPA guidelines do require that a condition of coverage for San Diego ambrosia requires 90% preservation of the population at the Mission Trails Regional Park. Should the project remove 10% of the population of the San Diego ambrosia a significant impact would occur.

Proposed Mitigation Measures:

Prior to the start of project activities, a qualified biologist shall attempt to locate the San Diego ambrosia (Ambrosia pumila) which may be present on the project site. If this sensitive plant is found on site, the plant shall be transplanted to an appropriate, protected site. The project location for the mitigation area is the existing San Diego ambrosia mitigation site located west of the Caltrans mitigation site. A 5-year monitoring program shall be required to provide assurances for its long-term success. The program should be consistent with the City of San Diego Mission Trails Regional Park San Diego Ambrosia Management Plan (May 15, 2000). The plan shall be approved by the program manager of the City's MSCP and the Assistant Deputy Director of LDR/EAS prior to project construction.

In order to assure that the endangered least Bell's vireo in the project area are not adversely affected by project activities during the listed bird's breeding season (March 15 to September 15), no project activities would be permitted to occur during the breeding season if the noise levels exceed 60 dB (hourly average) or exceed the ambient noise level if the ambient level already exceeds 60 dB (hourly average) within the area occupied by the least Bell's vireo, unless adequate noise attenuation measures (i.e. noise barrier) are implemented. If project activities are anticipated during the breeding season, protocol surveys of the area within 500 feet of the site by a qualified biologist shall be required prior to start of project activities. If nesting vireos are identified, project activities must cease for the remainder of the breeding season unless a qualified acoustician can demonstrate that with or without noise attenuation measures, project activity noise levels will not exceed 60 dB (hourly average) within vireo-occupied portions of the surveyed area.

Any project activities into the least Bell's vireo breeding season (March 15 to September 15) shall be reported to the program managers of the City's MSCP and EAS. Intrusion into the breeding season shall require the submittal and approval of the survey results and/or the noise study by MSCP and EAS prior to start or continuance of project activities.

Coastal sage scrub where gnatcatchers have established breeding territories or suitable as foraging habitat will be identified by biologists from the US Fish & Wildlife Service immediately prior to consideration for surface clearance. Areas where birds are actively nesting or foraging will be marked in site survey maps and furnished as geospatially referenced polygons. Field personnel will respect a 200-foot buffer around these gnatcatcher tracts between the inception of fieldwork and mid-August. These regions will be completely off-limits to entry for all UXO activities until they can be reexamined later in the breeding season. With approval of the Fish and Wildlife Service, tentatively after September 15, personnel may then enter areas, thinning brush as necessary for detection and disposal of UXO, following standard procedures.

In order to assure that the threatened California gnatcatchers in the area are not adversely affected by project activities during the listed bird's breeding season (March 1 to August 15), no project activities would be permitted to occur during the breeding season if the project activity noise levels exceed 60dB (hourly average) or exceed the ambient noise level if the ambient level already exceeds 60 dB (hourly average) within the adjacent habitat occupied by the gnatcatcher, unless adequate noise attenuation measures (i.e. noise barrier) are implemented. If project activities are anticipated during the breeding season, protocol surveys of the area within 500 feet of the site by a qualified biologist shall be required prior to start of project activities. If nesting gnatcatchers are identified, project activities must cease for the remainder of the breeding season unless a qualified acoustician can demonstrate that with or without noise attenuation measures, project activity noise levels will not exceed 60 dB(hourly average) within gnatcatcher-occupied portions of the surveyed area.

Any project activities into the California gnatcatcher breeding season (March 1 to August 15) shall be reported to the program managers of the City's MSCP and EAS. Intrusion into the breeding season shall require the submittal and approval of the survey results and/or the noise study by MSCP and EAS prior to start or continuance of project activities.

White-tailed kites and red-shouldered hawks have been observed during biological surveys of the project site; these raptors forage on the gophers, jackrabbits, and woodrats observed in the extensive, non-native grassland areas in the immediate project vicinity. In order to avoid indirect impacts to nesting raptors in the project vicinity, project activities during the raptors breeding season (December 1 to June 30) shall be avoided unless a survey is conducted by a qualified biologist to confirm that no nesting raptors are located within 500 feet of the project area. If nesting raptors are identified, project activities shall not be allowed until the nesting season is completed, or unless suitable mitigation measures are approved by the program manager of MSCP and the Assistant Deputy Director of LDR/EAS.

References: 5, 7, 9, 10, 12, 13, 25, 26, 27, 28

Findings of Significance:

- ❑ Potentially Significant Impact
- ☒ Potentially Significant Unless Mitigated
- ❑ Less Than Significant Impact
- ❑ No Impact

5. Cultural Resources

Project activities likely to create an impact:

- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

A records and literature search, and field survey of the area of potential effects was conducted by a private contractor in 1988. There were no detected or suspected historic resources on the immediate 12-acre site. This survey did however locate 8 prehistoric sites which were all located outside of the project area.

Analysis of Potential Impacts:

None of the previously identified archeological sites would be impacted by the proposed project because none of the sites are located in the project area.

The Corps will determine from surface examinations prior to beginning ordnance removal that no cultural resources would be affected.

Therefore the project will not:

a. Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

d. Disturb any human remains, including those interred outside of formal cemeteries.

References: 3, 5, 10, 15, 17, 23, 28

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ❑ Less Than Significant Impact
- ☒ No Impact

6. Geology and Soils

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

East Elliott lies within the coastal plain of the Peninsular Range physiographic province of Southern California. This area is characterized by prominent marine and alluvial terraces, locally interrupted by small mountains composed of crystalline rocks. The physiography of East Elliott is characterized by a series of sub-parallel, north-south-trending canyons that drain southward to the San Diego River, about 2 miles south of East Elliott. These canyons are separated by several ridges that have been heavily dissected by erosion. The canyons include (from west to east) Oak Canyon, a smaller tributary canyon in the northeast part of East Elliott, and converges with

Sycamore Canyon from the northwest. The northern boundary of East Elliott is near the heads of these canyons.

The geology of the San Diego area that encompasses East Elliott is grouped into two major units: 1) Jurassic-Cretaceous metamorphic and granitic rocks, and 2) the overlying sedimentary rock series. Weathered outcrops of Cretaceous quartz diorite and/or gabbro are just inside the southwest and southeast boundaries of the site.

Several soil types have been identified within the East Elliott study area based on parent rock type and slope angle. The soils are generally referred to as various types of sandy loam (mixtures of sand, silt, and clay) with rocks. Soils are generally thickest in the canyon areas because of accumulation of unconsolidated materials in these areas. These soils also have higher moisture content and support more abundant vegetation. Elsewhere in East Elliott, soils are generally thin and rocky.

The project site is currently undeveloped and contains non-native grasslands with patches of native vegetation. The majority of the12-acre site slopes gently to the southeast. The project site drops elevation from 350 feet Mean Sea Level (MSL) along it's northern boundary to 310 feet MSL along the southern access road. A drop of 40 feet over a distance of over 500 feet occurs across the site with a 20-foot drop occurring along the 160-feet-wide , northern portion. This northern sloped area is a continuation of the slope down from the freeway right-of-way above the project site.

Analysis of Potential Impacts:

The proposed project would not have any significant impacts on the topography/climate of the region. Magnetometers would be used to locate the UXO/OE. If ferrous objects are located during the surface search, hand tools will be used to dig these objects out to identify the nature of each magnetic anomaly. The project may result in creating small holes in the ground due to removal of UXO/OE. Excavations are expected to be less than 3 feet in depth.

Approximately 40% of all magnetic contacts in a grid will be excavated. Some potential UXO can be moved without hazard, and will be consolidated for disposal. When the excavation reveals a dangerous piece of unexploded ordnance, the object would be destroyed in place. The pit resulting from the explosion may be of intermediate size, e.g. 2 to 4 square feet, and conical in shape. All holes and pits would be refilled with the soil/dirt dug or ejected from them as soon as possible, and flattened to match the surrounding ground.

Temporary, short-term impacts to the region would occur from excavations of ordnance. Very localized disturbance, such as excavations by hand tools, would be repaired as soon as practicable. No area would be disturbed to an extent great enough to require restoration. No impacts would occur to the general physical setting of the region. Impacts related to OE removal are insignificant.

Therefore this project will <u>not</u>:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- *<u>Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42)</u>*

- Strong seismic ground shaking

- Seismic-related ground failure, including liquefaction
- Landslides

b. Result in substantial soil erosion or the loss of topsoil.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of water.

References: 2, 5, 10, 11, 15, 17, 18, 28.

Findings of Significance:

❑ Potentially Significant Impact
❑ Potentially Significant Unless Mitigated
❑ Less Than Significant Impact
☒ No Impact

7. Hazards and Hazardous Materials

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

The proposed project site was used by the Army during World War II and the Korean War (between the 1940s and 1950s). Unexploded Ordnance (UXO) may be buried beneath the ground or on the surface. Risk is related directly to contamination density, type of ordnance contamination and the location within the project area. The safety of both the general public and personnel involved in implementing an ordnance removal program is the prime concern.

The project primarily involves identifying UXO by magnetometers, excavation by hand tools and detonation-in-place of ordnance items. The potential for encountering UXO during the removal action does exist, and does present a risk to onsite workers, nearby populations, and the environment. The Site Safety and Health Plan (SSHP) included in the RAW provides appropriate safety procedures pertaining to the removal action and establishes policies and procedures that protect workers and the public from potential hazards posed by work at this site. Only personnel with UXO training will conduct the removal activities. In addition, daily tailgate safety meetings will be conducted to ensure specific conditions are being considered and the SSHP is implemented.

Upon completion of the proposed removal activities, warning signs will be posted in the areas where removal actions were not conducted. An ongoing public education program is also provided by the Mission Trails Regional Park.

Analysis of Potential Impacts:

Ordnance removal is inherently dangerous. All personnel receive highly specialized training in such matters. UXO personnel would be briefed every day of safety regulations. Hazards of unexploded munitions would be explained at each briefing, including other risks, such as those posed by rattlesnakes and poison oak, etc.

The potential for encountering UXO during the removal action poses the greatest risk to onsite workers, nearby populations, and the environment. The use of experienced personnel trained in handling and removal of UXO, conducting the work in accordance with approved methods and procedures, as prescribed in the Removal Action Work Plan and Health and Safety Plan, will reduce the risk of an uncontrolled or accidental explosion to a minimum.

Access into the work sites would be limited to the contractor personnel specifically authorized to enter the work site. All other personnel would be restricted from entering the site. Prior to initiation of demolition operations, all nonessential personnel will be evacuated to a distance outside the fragmentation zone of the UXO to be detonated. Radio communication would be maintained between all concerned parties. Only UXO personnel would be issued and/or transport explosive materials. All vehicles transporting explosives will be properly inspected prior to loading explosives onto the vehicle. The area would be secured prior to authorizing the detonation of explosive charges. Upon completion of disposal operations, the disposal team's UXO Supervisor and UXO Specialist would visually inspect each disposal shot. Upon completion of the inspection and providing there are no residual hazards, the UXO Senior Supervisor will authorize the resumption of site operations. Signs would be posted of blasting danger and guards stationed at all likely trail entrances. By these measures, no incident of public injury due to ordnance removal should occur.

Other than on site workers, a concern is unauthorized personnel walking into the exclusion zone during detonation activities. The trails in the project area will be barricaded and unauthorized personnel will be warned to stay out. When a detonation-in-place is to occur, contractor personnel will be posted in a 360-degree radius around the detonation site, at a safe distance. Whenever possible, an electrical firing system will be utilized for maximum control. All trails will be blocked. Even with these positive factors, it is still a concern that hikers could penetrate the personnel posted radius because of the high vegetation, which limits visibility. The ACOE will exercise maximum care to assure this does not happen.

There are no schools located within ¼ mile of the project site. West Hills High School is located over ½ mile east of the project site, therefore it would not be impacted by project activities.

The project site is not located on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, therefore it will not create a significant hazard to the public or the environment.

Project activities will be located within Mission Trails Regional Park and will not impact any emergency response or evacuation routes.

Although unlikely, but possible, unexploded ordnance could be lying on the ground in the vicinity of the utility power lines and structures. This would necessitate the recalculation of the sandbag structure to assure protection of the power lines.

Therefore this project will <u>not</u>:

a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to public or the environment.

e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

References: 5, 7, 18, 23.

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ☒ Less Than Significant Impact
- ❑ No Impact

8. Hydrology and Water Quality

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

The East Elliott area is part of the Upper San Diego River Basin. Ephemeral streams in East Elliott canyons flow southward into the westward-flowing San Diego River. Streambeds are dry for the majority of the year, and flowing water is confined to episodic storm events during the annual rainy season (November to March). Important surface water hydrologic features adjacent to East Elliott include the San Diego River and Mission Canyon Reservoir to the south and southwest, respectively, and the Santee Recreational Lakes to the east. Long-term runoff records have been maintained for the San Diego River at the Mission Dam, about 2 miles southwest of East Elliott. Mean annual runoff from 1944 to 1970 was about 3,600 acre-feet per year. Zero-flow conditions were noted during most of the 26 years covered by these records. Near the southeast corner, two seasonal but unnamed stream courses follow narrower washes in a southeasterly direction. A fourth seasonal drainage, Quail Canyon, crosses the northeast corner and heads southeast where it joins Sycamore Canyon. The East Elliott project boundaries parallel Sycamore Canyon on the east but do not extend into its floodplain.

The 12-acre project site is flanked on the west by a drainage which flows from Little Sycamore Canyon under SR 52 through a culvert, drains the western portion of the project site, and eventually flows into the San Diego River.

Depths to groundwater in the San Diego area is from less than 25 feet to 75 feet, and would be expected to be shallowest near the river and other water bodies

Analysis of Potential Impacts:

The proposed project would not result in significant impacts to water quality. The project area is dissected by several non-perennial washes. Sampling grids located within or in the vicinity of the streams or washes would be relocated. UXO removal activities may result in generating loose soils, which would be subject to erosion. The holes generated due to UXO removal action would be small in size and would be filled and compacted after the removal activities. The use of berms, dikes and barriers with plastic sheeting will be employed as needed to control water run-on/run-off and sediment or siltation migration. All sediment and erosion control measures will be monitored and properly maintained.

The selected contractor would perform all project activities in a manner that prevents the discharge of pollutants into adjacent waterways from the project area. Water sources such as sinks, showers, and all toilet facilities would be of the fixed, indoor type or the portable chemical type. Disposal of wastes from the portable sanitary systems would be transported to an off-site disposal facility.

For wastewater management, the contractor would ensure run-on and run-off is controlled. In the event that Hazardous, Toxic, and Radiological Waste is encountered, the contractor would dispose of contaminated water by packaging the waste in approved containers for legal disposal. The impacts to water quality and water resources from this project would be minimal and insignificant.

Therefore this project will <u>not</u>:

a. Violate any water quality standards or waste discharge requirements.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

f. Otherwise substantially degrade water quality.

g. Place within a 100-flood hazard area structures which would impede or redirect flood flows.

h. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

i. Inundation by sieche, tsunami or mudflow.

References: 1, 2, 5, 6, 8, 10, 15, 17, 18, 28

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ❑ Less Than Significant Impact
- ☒ No Impact

9. Land Use and Planning

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

The proposed project area consists of open land, hiking, rock climbing, birding, biking, picnicking and unauthorized off-road vehicle trails. In the vicinity of the project area, general land use includes suburban residential and commercial communities. They include primarily single and multiple family homes. East Elliott is zoned for residential and light commercial. The project area is in the northeastern portion of the Mission Trails Regional Park, Marine Corps Miramar to the northwest, the drainage of the Little Sycamore Canyon to the west, Mast Boulevard to the east. City, and a Caltrans mitigation site and the San Diego River to the south.

Analysis of Potential Impacts:

No significant impacts are expected from the proposed operation. The existing land use would not be altered by the proposed removal activities.

Therefore the project will <u>not</u>:

a. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

b. Conflict with any applicable habitat conservation plan or natural community conservation plan.

References: 3, 23, 28

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ❑ Less Than Significant Impact
- ☒ No Impact

10. Mineral Resources

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

East Elliott lies within the coastal plain of the Peninsular Range physiographic province of Southern California. This area is characterized by prominent marine and alluvial terraces, locally interrupted by small mountains composed of crystalline rocks. The physiography of East Elliott is characterized by a series of sub-parallel, north-south-trending canyons that drain southward to the San Diego River, about 2 miles south of East Elliott. These canyons are separated by several ridges that have been heavily dissected by erosion. The canyons include (from west to east) Oak Canyon, a smaller tributary canyon in the northeast part of East Elliott, and converges with Sycamore Canyon from the northwest. The northern boundary of East Elliott is near the heads of these canyons.

The geology of the San Diego area that encompasses East Elliott is grouped into two major units: 1) Jurassic-Cretaceous metamorphic and granitic rocks, and 2) the overlying sedimentary rock series. Weathered outcrops of Cretaceous quartz diorite and/or gabbro are just inside the southwest and southeast boundaries of the site.

Several soil types have been identified within the East Elliott study area based on parent rock type and slope angle. The soils are generally referred to as various types of sandy loam (mixtures of sand, silt, and clay) with rocks. Soils are generally thickest in the canyon areas because of accumulation of unconsolidated materials in these areas. These soils also have higher moisture content and support more abundant vegetation. Elsewhere in East Elliott, soils are generally thin and rocky.

Analysis of Potential Impacts:

The project activities do no entail development or construction in the project area and will not cause any known mineral resources of value to the region to be lost.

Therefore this project will not:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

References: 3, 5, 23, 28.

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ❑ Less Than Significant Impact
- ☒ No Impact

11. Noise

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

The project site is located in an open recreational area. The noise level within the project area is generated primarily by dump trucks passing through the project area to the landfill site and vehicles passing on Highway 52. Cal/OSHA regulations, Title 8, California Code of Regulations (CCR), Section 5096, limits workers exposed to 85 dB for an 8-hour work period. U. S. Environmental Protection Agency (USEPA) has identified a level of 55 dB as adequate to protect outdoor activities against interference and annoyance due to noise. This level will permit spoken conversation and other activities such as sleeping, working and recreation, which are part of the daily human condition.

Analysis of Potential Impacts:

Project related noise impacts would be short-term and insignificant. Noise generated by use of magnetometers and hand-held chain-saws would be less than noise generated due to vehicles traveling through Highway 52 and dump trucks passing through the project area, and within CAL/OSHA standards of 85dB. Detonation of UXO items would generate a very short term noise impact audible for a few dozen yards. Since the detonation area will be barricaded to prevent entry from unauthorized personnel, the noise will have minimum impacts to the public in the case of detonation-in place.

Therefore the project will <u>not</u>:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

b. Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.

c. A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

References: 5, 22, 23

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ❑ Less Than Significant Impact
- ☒ No Impact

12. Population and Housing

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

The project site has no housing and has unrestricted access for the public including hikers, bike riders, horseback riders, rock climbers and others.

Analysis of Potential Impacts:

The proposed ordnance removal activities will have an impact upon the recreational activities during workdays, as the trails will be barricaded and the public will not be allowed in the area where detonation-in-place is taking place. However, the proposed projects are temporary, lasting approximately 2-4 weeks. No permanent impact will be posed by the proposed activities.

Therefore the project will <u>not</u>:

a. Induce substantial population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

References: 3, 5, 23

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ❑ Less Than Significant Impact
- ☒ No Impact

13. Public Services

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

There is no housing or residents within the project area. Public services include Fire Departments and Police Departments from the City of San Diego and the City of Santee as well as the Park and Recreation Department from the City of San Diego.

Analysis of Potential Impacts:

Since the project will not increase the permanent work force at East Elliott, or affect the population in the surrounding area, public services such as fire and police protection, schools, roads, hospitals and other medical facilities will not be impacted. The number of project personnel involved in the project may range from 7 to 9 persons during the field activities for a period of approximately 2-4 weeks. Since the project field activities will last for a relatively short duration and will involve a small number of personnel, the impacts on public services will be insignificant.

Therefore the project will <u>not</u>:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

    - Fire protection
    - Police protection
    - Schools
    - Parks

- Other public facilities

References: 5, 17, 23

Findings of Significance:

❑ Potentially Significant Impact
❑ Potentially Significant Unless Mitigated
❑ Less Than Significant Impact
☒ No Impact

14. Recreation

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

The project site has unrestricted access for the public including hikers, bike riders, horseback riders, rock climbers and others.

Analysis of Potential Impacts:

The proposed ordnance removal activities will have an impact upon the recreational activities during workdays, as the trails will be barricaded and the public will not be allowed in the area where detonation-in-place is taking place. However, the proposed project is temporary, approximately 2-4 weeks. No permanent impact will be posed by the proposed activities.

Therefore this project will <u>not</u>:

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

b. Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Findings of Significance:

❑ Potentially Significant Impact
❑ Potentially Significant Unless Mitigated
❑ Less Than Significant Impact
☒ No Impact

15. Transportation and Traffic

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

Small dirt roads and trails cover the entire project area, except the paved road accessing the landfill site. In the vicinity of the project area, Mission Gorge Road provides a transportation route for the western portion of the Navajo community and as a link between the cities of San Diego and Santee. Highway 52 is located in the vicinity of the project area.

For roadways intersecting the MSD, dedicated guards with radios will be placed at a location sufficiently outside the MSD to alert the UXO team of vehicular and rail traffic entry into the MSD. All intrusive activities will stop until the MSD is free of vehicles. In addition, the intrusive activities will be focused to the off-peak traffic times to maximize production.

Traffic control measures will be taken to ensure proper traffic flow into and out of the removal area and will include, but not be limited to, the identification of routes by flagging, barricades, traffic delineators, or cones. The primary access to East Elliott is Highway 52. Vehicular access to the project will be kept to a minimum. All proposed routes of travel and parking areas will be designated and cleared (authorized) by the CESPL and the City of San Diego prior to commencement of the geophysical and soil sample study.

Vehicles will be parked solely within the site area. Transportation related to the project will take place at off-peak traffic hours between 9:00 a.m. to 4:00 p.m. A maximum of six vehicles will be used for the transportation of explosive materials from the storage area to the project site. All materials will be stored off-site at Baxter Blasting Company, El Cajon, CA. Two type II magazines will be utilized. These magazines are located within a secure facility belonging to Baxter Blasting Co.

Transportation of safe to move UXO items (non-UXO) within the site boundary will comply with all federal, state, and local regulations. It is not anticipated that any UXO will need to be transported off-site. If site conditions change, an addendum to the work plan will be prepared and submitted to ACOE and DTSC for review prior to modification of the current work plan procedures. A qualified UXO representative will escort all movement of safe to move UXO items on-site. When transporting UXO within the site for consolidation purposes, vehicles will not exceed 25 mph on designated routes. All movement of UXO and demolition explosives on-site outside the approved driving areas will be via pedestrian means. UXO will not be transported in conjunction with demolition materials.

Analysis of Potential Impacts:

There will be no significant impact to traffic circulation from the proposed project since only a small number of vehicles will be used for the transportation of explosive material from the storage area to the project site.

Therefore the project will not:

a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of Vehicular trip, the volume to capacity ratio on roads, or congestion at intersections).

b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.

c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d. Result in inadequate emergency access.

e. Result in inadequate parking capacity.

f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

References: 5, 23

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ☒ Less Than Significant Impact
- ❑ No Impact

16. Utilities and Service Systems

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

Utilities for the project will include electricity, potable water, and telephone services. There are utility lines transgressing the project site. San Diego Gas and Electric supplies electricity and natural gas. Within the project area, no distribution lines or natural gas mains are located since it is an undeveloped open space. The project does not anticipate the need to utilize the sanitary/industrial sewers or storm drainage systems.

Analysis of Potential Impacts:

The proposed project involves surface and subsurface clearances, no intrusive activities are anticipated. If intrusive digging for subsurface anomaly occurs, utility companies will be notified

to avoid any potential impact. The project is of short duration and minimal scale. Therefore, no substantial changes in energy use or demand will result. The proposed project will use fuels such as gasoline and diesel fuel for worker vehicles. Fuel consumption for the minimal number of vehicles involved would not be substantial. The proposed project has no requirements for electricity or natural gas, and no impacts are anticipated. Portable water will be available at the project site. The area will be serviced by public sewer through the Padre Dam Water District. The site can either pump wastewater to the public sewer or install a on-site septic system.

Therefore the project will not:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

e. Result in determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

g. Comply with federal, state, and local statutes and regulations related to solid waste.

References: 4, 5, 8, 14,23

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ❑ Less Than Significant Impact
- ☒ No Impact

17. Cumulative Effects

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Description of Environmental Setting:

The proposed project at East Elliott is managed under the DERP FUDS. Previous investigations and removal activities have been undertaken in the past. The investigation approach consisted of dividing East Elliott into four sectors for the purposes of evaluating risk and developing recommendations for each area. Removal action alternatives were recommended based on the evaluations. The EE/CA summarized the findings and recommendations. No other removal activities will be conducted concurrently with the proposed project.

Analysis of Potential Impacts:

This project will be accomplished with conventional technologies such as magnetometers, shovels and other hand tools. As such, it will have no impact on the need for development of new technologies.

This project will not lead to a series of projects. However, other removal activities will be conducted in other areas of Camp Elliott in the future. The FUDS Program is designed to provide a framework for investigating and cleaning up of UXO sites at Camp Elliott. Removal actions for other sectors are not planned concurrently with the proposed project. This will eliminate the cumulative impacts on public services, utilities, and energy.

Therefore the project will <u>not</u>:

a. Increase the need for developing new technologies, especially for managing any hazardous or non-hazardous wastes that the project generates.

b. Increase the need for developing new technologies for any other aspects of the projects.

c. Leads to a larger project or leads to a series of projects, or is a step to additional projects. (Examples of DTSC projects include Interim Corrective Measures and Removal Actions that are not final remedies for a site or facility.)

d. Alters the location, distribution, density or growth rate of the human population of an area.

e. Affect existing housing, public services, public infrastructure, or creates demands for additional housing.

f. Be cumulatively considerable on the environments with cumulative adverse effects on air, water, habitats, natural resources, etc.

References: 5,23

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ❑ Less Than Significant Impact
- ☒ No Impact

18. Mandatory Findings of Significance

Project activities likely to create an impact:

- Vegetation Trimming
- Geophysical Survey
- Intrusive Investigation
- Surface/Subsurface UXO Clearance
- Intentional UXO Detonations

Therefore this project will not:

a. Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

   The Cultural Resources and Biological Resources Section of this initial study support this determination.

b. Have impacts that are individually limited but cumulatively considerable. As used in the subsection, "cumulatively considerable".

   The Cumulative Effects Section of this initial study supports this determination.

   ["Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects]

c. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

   The Hazards and Hazardous materials Section and the Population and Housing Section in this initial study support this determination.

Findings of Significance:

- ❑ Potentially Significant Impact
- ❑ Potentially Significant Unless Mitigated
- ☒ Less Than Significant Impact
- ❑ No Impact

V. DETERMINATION OF APPROPRIATE ENVIRONMENTAL DOCUMENT

On the basis of this Initial Study:

- ❑ I find that the proposed project COULD NOT have a significant effect on the environment. A NEGATIVE DECLARATION will be prepared.

- ☒ I find that although the proposed project COULD HAVE a significant effect on the environment, mitigation measures have been added to the project, which would reduce these effects to less than significant levels. A NEGATIVE DECLARATION will be prepared.

- ❑ I find that the proposed project COULD HAVE a significant effect on the environment. An ENVIRONMENTAL IMPACT REPORT will be prepared.

DTSC Project Manager Signature	Title	Telephone #	Date

DTSC Branch/ Unit Chief Signature	Title	Telephone #	Date

ATTACHMENT A

INITIAL STUDY
REFERENCE LIST
for
Removal Action Work Plan for a Non-Time Critical Removal Action, an interim measure at East Elliott, Camp Elliott, San Diego, California

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3. City of San Diego Planning Department, 1971. Elliott Community Plan; adopted by the San Diego City Council, April 29.

4. CMS Environmental, Inc. (CMS), 1997. Ordnance and Explosives (OE) Sampling Draft Removal Report, Camp Elliott (East Elliott), California. March 7.

5. Dames & Moore, 1991. Final Environmental Assessment, Ordnance Clearance, Mission Trails Regional Park; submitted to U.S. Army Engineer Division, Huntsville, AL. September.

6. Department of Toxic Substances Control (DTSC), 1998. Requirements for Ordnance and Explosive (OE) Risk Management Activities at Closed, Transferred, or Transferring Ranges.

7. DJG, Inc., et al. (DJG), 1988. Feasibility Study of Remedial Action Alternatives for Conventional Explosive Ordnance Items on the Former Camp Elliott, San Diego, CA; submitted to U.S. Army Engineer Division, Huntsville, AL. April 27.

8. James M. Montgomery, Consulting Engineers, Inc. (now Montgomery Watson), 1973. Report on Hydrogeologic Investigation in the Upper San Diego River Valley; prepared for the Santee County Water District, County of San Diego Department of Sanitation and Flood Control. June.

9. McGriff, pers.comm., 1997. Telephone interview conducted by Montgomery Watson employee Margaret Crawford with Darlene McGriff of the California Department of Fish and Game. November 18.

10. Montgomery Watson, 1995. Formerly Used Defense Site Camp Elliott (East Elliott), San Diego, California, Final Archives Search Report. April.

11. Montgomery Watson, 1999. Draft Public Involvement Plan, Formerly Used Defense Site Camp Elliott (East Elliott), California. August.

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13. Ogden Environmental, 1996. Multiple Species Conservation Program (MSCP) Plan. Prepared in Cooperation with the MSCP Policy Committee and the MSCP Working Group. August.

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17. USEPA, 1993a. Guidance on Conducting Non-Time-Critical Removal Actions Under CERCLA. EPA540-R-93-057, August.

18. USEPA, 1993b. Handbook, Approaches for the Remediation of Federal Facility Sites Contaminated with Explosive or Radioactive Waste. EPA625/R-93/013, September.

19. Young, Roger, P.G., and Lynn Helms, P.G., 1997. Applied Geophysics and the Detection of Buried Munitions. Available from http://www.hnd.usace.army.mil/oew/; Internet.

20. South Coast Air Quality Management District (SCAQMD) Rules and Regulations.

21. SCAQMD CEQA Handbook, Table 9-9-G

22. U.S. Environmental Protection Agency (USEPA), Office of Noise Abatement and Control. 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an adequate Margin of Safety. 550/9-74-004. March

23. Montgomery Watson. Final Engineering Evaluation/Cost Analysis (EE/CA), Camp Elliott (East Elliott) August, 1999.

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25. Helix Environmental Planning, Inc., 2001. Mission Trails Regional Park Multi-use Staging Area Project Biological Technical Report, August 20.

26. California Department of Fish and Game, 2003. Natural Diversity Data Base, La Mesa, February 6.

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